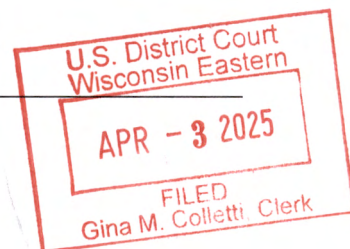


# COMPLAINT

(for filers who are prisoners without lawyers)

## UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WISCONSIN



(Full name of plaintiff)

**Andrew Crutcher**

v.

Case Number:

(Full name of defendant(s))

**Juan Castelan**

(to be supplied by Clerk of Court)

**Nathan Arjon**

**Christopher Schmailing**

**Vital Core Health Care Stragies**

### A. PARTIES

1. Plaintiff is a citizen of **Wisconsin**, and is located at  
(State)

**New Lisbon Corr. Inst., P.O.Box 2000 New Lisbon WI 53950**

(Address of prison or jail)

2. Defendant **Juan Castelan**  
(Name)

is (if a person or private corporation) a citizen of **Wisconsin**  
(State, if known)

and (if a person) resides at **Unknown**  
(Address, if known)

A. PARTIES - Continued

3. Defendant Nathan Arjon is a citizen of Wisconsin and resides at an unknown address and worked for the Racine County Jail as a correctional officer.

4. Defendant Christopher Schmailing is a citizen of Wisconsin and resides at an unknown address and worked as a sheriff for the racine county jail.

5. Defendant vital core health care strategies is a private corporation? and address is unknown. Racine county jail had a contract with vital core.

and (if the defendant harmed you while doing the defendant's job)

worked for The Racine County Jail as a correctional officer

(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

Plaintiff Andrew Crutcher was booked into the Racine County jail on June 28,

2023 until he got sentenced on August 2, 2024. Defendant's Juan Castelan and

Natahan Arjon were Correctional officer's during the relevant time period.

Defendant Christopher Schmailing was the Sheriff of the Racine county jail

during the times relevant to this suit. Defendant Vital Core Health Care

Strategies and it's insurer had a contract with the Racine County jail.

On September 29, 2023 plaintiff verbally informed correctional officer Juan

Castelan that psychologist Brittany Perez had been sexually harrassing him

and that he did not feel comfortable seeing her. Plaintiff informed Juan

Castelan that psychologist Brittany Perez would report that she was sexually

abused by the plaintiff if he (the plaintiff) did not accept contraband from

her in order for plaintiff to sell in the jail and to send psychologist

Perez the money to her cash app from the sales of the contraband that Perez was pressuring the plaintiff to accept. Plaintiff felt pressured into accepting the contraband from Perez in fear that Perez would report that he sexually abused her. Plaintiff reluctantly accepted the contraband. Plaintiff informed defendant Juan Castelan of these concerns!! Defendant Castelan had verbally informed plaintiff that he would report his concerns to the jail administration!! Plaintiff did not hear anything back regarding his verbal complaints. Plaintiff alleges that defendant Castelan failed to protect him psychologist Brittany Perez' sexual harrasement. On October 18, 2023 plaintiff verbally informed defendant Nathan Arjon that psychologist Brittany perez had been sexually harrassing him and that he did not feel comfortable seeing her. Plaintiff informed defendant Arjon that he also verbally informed defendant Castelan that psychologist Brittany perez had been sexually harrassing him but nothing was being done about it. Plaintiff informed defendant Arjon that psychologist perez would report that she was being sexually abused by the plaintiff if he (the plaintiff) did not accept contraband from her in order for the plaintiff to sell in the jail and to send ms.Perez the money to her cash App from the sales of the contraband that perez was pressuring the plaintiff to accept. Plaintiff verbally informed defendant Arjon that he felt

pressured into accepting the contraband from perez in fear that perez  
would report that he sexually abused her. Defendant Arjon verbally  
informed the plaintiff that he would report the plaintiffs concerns to  
jail administration. However, plaintiff still had heard nothing back  
from his verbal complaints. Plaintiff alleges that his failure to  
protect claims against defendant's Arjon and Castelan arise under the  
14th amendment due process clause. Plaintiff further alleges that  
defendant's Arjon and Castelan were both aware, through plaintiffs  
verbal complaints to the both of them, that the plaintiff faced a risk  
of serious harm to falsified sexual abuse allegations from Perez and  
that both defendant's failed to intervene despite informing the  
plaintiff that they would report the plaintiffs verbal complaints to  
jail administration.<sup>1</sup> Plaintiff alleges that defendant Christopher  
Schmailing provided inadequate training and policies to defendant's  
Arjon and Castelan relating to "PREA" - Prison Rape Elimination Act  
policies and reporting obligations. Defendant Schmailing also failed  
to adequately supervise both defendant Arjon and Castelan. Plaintiff  
alleges that defendant Schmailing failed to train defendant's Arjon  
and Castelan on the jails PREA policies relating to staff and inmate

contact and how to report such contact, along with how to prevent and detect misconduct at the jail. Plaintiff alleges that defendant Vital Core is liable because it's policies related to the performance of its professional services caused the plaintiff to have suffered emotional distress. Brittany perez, who worked for vital core, was never adequately trained and educated on the prison rape elimination act policies regarding both staff and inmate contact and sexual misconduct policies. Vital core failed to provide adequate training and supervisory skills to it's employee's which resulted in the plaintiff having to endure unnecessary emotional distress.

C. JURISDICTION



I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR



I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$\_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the Court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or to stop doing something.

**Plaintiff is requesting both compensatory and punitive damages relating to the allegations alleged in this lawsuit. Plaintiff will itemize his damages later on in this lawsuit.**

E. JURY DEMAND

I want a jury to hear my case.

☒ - YES

☐ - NO

I declare under penalty of perjury that the foregoing is true and correct.

Complaint signed this 30<sup>th</sup> day of March 2025.

Respectfully Submitted,

Andrew L. Crutcher  
Signature of Plaintiff

556408  
Plaintiff's Prisoner ID Number

New Lisbon Correctional Institution - P.O. Box  
2000, New Lisbon WI, 53950  
(Mailing Address of Plaintiff)

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE FULL FILING FEE**



I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a Request to Proceed in District Court without Prepaying the Full Filing Fee form and have attached it to the complaint.



I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.